

EXHIBIT A

1. The Plaintiff, Cynthia Williams, is an adult citizen of the State of Ohio and a resident of Montgomery County.
2. Upon information and belief, Defendant, Family Dollar Stores of Ohio Inc., at all times relevant, was a company registered with the Ohio Secretary of State to do business in the state of Ohio, conducted business in the state of Ohio, is subject to jurisdiction in the state of Ohio, and has committed a tort in the state of Ohio. Defendant was the owner/operator of the Family Dollar Store, located at 1028 North Gettysburg Ave, Dayton, Montgomery County, Ohio.
3. Plaintiff is unaware of the true names, identities and capacities, whether individual, corporate, associate, or otherwise, of those defendants sued herein as John Doe, Jane

Doe, and XYZ Corporation and will amend this Complaint so as to more specifically set forth the names and identities of the Doe defendants when they have been determined.

4. Upon information and belief, Plaintiff alleges that each Doe defendant and corporation is legally responsible for the acts and events complained herein and that Plaintiff's injuries, losses and damages were proximately caused by the negligence, fault, wrongful acts and/or legal responsibility of aforementioned defendants.
5. Upon information and belief, Plaintiff alleges that Defendants are legally responsible for the acts and events complained herein and that Plaintiff's injuries, losses and damages were proximately caused by the negligence, fault, wrongful acts and/or legal responsibility of aforementioned defendants.

FIRST CLAIM FOR RELIEF

6. Defendants are, and at all times herein mentioned were, a limited liability company, corporation or some other type of business entity of unknown form doing business as, or in relation to the subject restaurant.
7. On or about December 21, 2019, Plaintiff was a business invitee, walking through the subject site managed by the Defendant Family Dollar Stores of Ohio, Inc. and/or Defendant XYZ Corporation. At the same time and place, the floor was slippery and wet. The slippery and wet area caused Plaintiff to slip and fall, causing her severe injuries more fully described below.
8. Upon information and belief, Defendants are the owners and/or have a majority interest in the subject property.
9. Defendants knew, or, in the exercise of reasonable care should have known, of the condition, or Defendants created the condition either through the acts of its employees, in its negligent maintenance of equipment, or in its negligent method of operation, and Defendants should have corrected the condition or warned Plaintiff of its existence. Additionally, Defendants should have had non-slip surface which would have prevented the fall which resulted from a foreseeable condition.
10. As owners and/or operators of the site in question, Defendants had reason to know, or should have known of the dangerous conditions a slippery and wet floor poses.
11. Defendants neither put Plaintiff on notice, nor remedied the deficiency.
12. Plaintiff at all times mentioned, was an invitee of the Defendants and therefore Defendants owed Plaintiff the duty of providing a reasonably safe and maintained environment.
13. Defendants knew or should have known that the slippery and wet floor constituted a hazardous condition, and that this condition existed at the time Plaintiff was injured.

14. Defendants' behavior was negligent.

15. As a proximate result of Defendants' negligence, Plaintiff suffered injuries and damages including but not limited to, the following:

- a. Severe injuries, including but not limited to: lower extremity traumas including a fracture of the right ankle which required surgery, swelling, depression, anxiety, permanent scarring, a permanent limp and overall disruption of life.
- b. Great pain and suffering, both physical and emotional, the loss of ability to perform usual functions, difficulty standing and walking, and the injuries will continue to cause pain and suffering in the future; and,
- c. Reasonable and necessary medical expenses in an amount in excess of \$84,649.53, as well as further reasonable and necessary medical expenses to be incurred in the future including but not limited to physical therapy, consultations, and appliances.

16. The aforesaid negligence of Defendants was the direct and proximate cause of the injuries and damages to Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants in excess of \$25,000.00, to be determined by a jury but to include interest, punitive damages, attorney's fees and the costs of this action.

Respectfully Submitted,

/s/ Robert L. Gresham

Robert L. Gresham, #0082151

Michael L. Wright, #0067698

Kesha Q. Brooks, #0095424

Wright & Schulte, LLC

130 W. Second Street, Suite 1600

Dayton, Ohio 45402

PH: (937) 222-7477

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rgresham@yourohiollegalhelp.com

mwright@yourohiollegalhelp.com

kbrooks@yourohiollegalhelp.com

Attorneys for Plaintiff

JURY DEMAND

Now comes Plaintiff, by and through counsel, and hereby demands a trial by jury on all issues of this matter.

/s/ Robert L. Gresham

Michael L. Wright, Esq.

Robert L. Gresham, Esq.

Kesha Q. Brooks, Esq.

Attorneys for Plaintiff

MONTGOMERY COMMON PLEAS COURT / GENERAL DIVISION
CIVIL CASE INFORMATION

This document has been automatically generated by the Electronic Filing System

PARTICIPANT NAME	TYPE	ATTORNEY FOR PARTY
CYNTHIA WILLIAMS	MAIN PLAINTIFF	GRESHAM
FAMILY DOLLAR STORES OF OHIO INC	MAIN DEFENDANT	

CATEGORY	VALUE
CASE TYPE	Civil
JURY DEMAND	Yes
PRAYER AMOUNT	25000
ACTION TYPE	PERSONAL INJURY
TYPE OF RESOLUTION	
PARCEL NUMBER (MORTGAGE FORECLOSURE ONLY)	

REFILING INFORMATION

CASE NUMBER	JUDGE	MAIN PLAINTIFF	MAIN DEFENDANT
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SUITS INVOLVING LIKE ISSUES AND SIMILAR PARTIES

CASE NUMBER	JUDGE	MAIN PLAINTIFF	MAIN DEFENDANT
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The Filer submitted this information and the document was generated.
Filer: Robert L. Gresham

MIKE FOLEY
MONTGOMERY COUNTY CLERK OF COURTS
41 N. PERRY STREET, DAYTON, OHIO 45422

INSTRUCTIONS FOR SERVICE

CYNTHIA WILLIAMS
PLAINTIFF/PETITIONER

FAMILY DOLLAR STORES OF OHIO INC
DEFENDANT/RESPONDENT

PLEASE ISSUE SERVICE TO: (Name and Address)

FAMILY DOLLAR STORES OF OHIO INC
CO CORPORATE SERVICE COMPANY
50 W. BROAD ST SUITE 1330
COLUMBUS, OH 43215

JOHN AND OR JANE DOE EMPLOYEE
UNKNOWN ADDRESS
DAYTON, OH 45422

XYZ CORPORATION
UNKNOWN ADDRESS
DAYTON, OH 45422

VIA: Service by Clerk

SERVICE PROVIDER:

TO BE SERVED (List all Documents to be Served)

Complaint FOR PERSONAL INJURIES, WITH JURY DEMAND ENDORSED HEREON

Electronically Requested by: Robert L. Gresham

**IN THE COURT OF COMMON PLEAS, MONTGOMERY COUNTY OHIO
CIVIL DIVISION**

SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310232052

TO THE FOLLOWING NAMED DEFENDANT:

FAMILY DOLLAR STORES OF OHIO INC
CO CORPORATE SERVICE COMPANY
50 W. BROAD ST SUITE 1330
COLUMBUS OH 43215

You have been named a Defendant or Respondent in a complaint filed in Montgomery County Court of Common Pleas, Dayton, Ohio. **A copy of the Complaint is attached.**

BY:

CYNTHIA WILLIAMS
1555 N. EUCLID AVE
DAYTON, OH 45406

PLAINTIFF ATTORNEY:

ROBERT L. GRESHAM
130 W SECOND ST
SUITE 1600
DAYTON, OH 45402

You are hereby summoned and required to serve upon the Plaintiff's attorney, or upon the Plaintiff, if the Plaintiff does not have an attorney, a copy of an **Answer to the Complaint** within **28 days after receipt of this summons, exclusive of the day you received the summons.** Your original **Answer** must be filed with the Clerk of Court's Office **within 3 days** after you serve the Plaintiff's attorney or Plaintiff.

If you fail to appear and defend, Judgment by Default may be rendered against you granting Plaintiff(s) the relief demanded in the Complaint.

NOTE:

If you are represented by an attorney, your attorney is required to electronically file your Answer through the Court's authorized electronic filing system. See Montgomery County Common Pleas Court Loc. R. 1.15, Electronic Filing of Court Documents, for requirements of electronic filing. Local rules can be accessed at www.montcourt.oh.gov. Service of the Answer will be made upon the Plaintiff's attorney through the Court's authorized electronic filing system. If the Plaintiff does not have an attorney, your attorney is required to serve a paper copy of your Answer to the Plaintiff.

If you are representing yourself (appearing pro se), you have the option to file your Answer in paper OR through the Court's authorized electronic filing system (See Loc. R. 1.15, Electronic Filing of Court Documents). Local rules can be accessed at www.montcourt.oh.gov. If you file your Answer in paper, you are required to serve a paper copy of your Answer to the Plaintiff's Attorney or the Plaintiff. If you file your Answer electronically, service of the Answer will be made upon the Plaintiff's attorney through the Court's authorized electronic filing system. If the Plaintiff does not have an attorney, you are required to serve a paper copy of your Answer to the Plaintiff.



/s/ MIKE FOLEY, ISSUED Thursday, December 9, 2021

MIKE FOLEY, CLERK

COURT OF COMMON PLEAS

MONTGOMERY COUNTY, OHIO

PREPARED ELECTRONICALLY

**In The Court Of Common Pleas, Montgomery County Ohio
Civil Division**

RETURN OF SERVICE SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310232052

TO THE FOLLOWING NAMED PARTY:

FAMILY DOLLAR STORES OF OHIO INC

CO CORPORATE SERVICE COMPANY

50 W. BROAD ST SUITE 1330

COLUMBUS, OH 43215

RETURN OF SERVICE(PERSONAL)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made personal service of it upon _____ by locating him/them and tendering a copy of the document and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(RESIDENCE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made residence service of it upon _____ by leaving, at his/their usual place of residence with _____ a person of suitable age and discretion then residing therein a copy of the complaint and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(FAILURE OF SERVICE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. with instructions to make personal/residence service upon _____ and I was unable to serve a copy documents upon him/them for the following reasons:

By _____

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**IN THE COURT OF COMMON PLEAS, MONTGOMERY COUNTY OHIO
CIVIL DIVISION**

SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310236242

TO THE FOLLOWING NAMED DEFENDANT:

JOHN AND OR JANE DOE EMPLOYEE

UNKNOWN ADDRESS

DAYTON OH 45422

You have been named a Defendant or Respondent in a complaint filed in Montgomery County Court of Common Pleas, Dayton, Ohio. **A copy of the Complaint is attached.**

BY:

CYNTHIA WILLIAMS

1555 N. EUCLID AVE

DAYTON, OH 45406

PLAINTIFF ATTORNEY:

ROBERT L. GRESHAM

130 W SECOND ST

SUITE 1600

DAYTON, OH 45402

You are hereby summoned and required to serve upon the Plaintiff's attorney, or upon the Plaintiff, if the Plaintiff does not have an attorney, a copy of an **Answer to the Complaint** within **28 days after receipt of this summons, exclusive of the day you received the summons.** Your original **Answer** must be filed with the Clerk of Court's Office **within 3 days** after you serve the Plaintiff's attorney or Plaintiff.

If you fail to appear and defend, Judgment by Default may be rendered against you granting Plaintiff(s) the relief demanded in the Complaint.

NOTE:

If you are represented by an attorney, your attorney is required to electronically file your Answer through the Court's authorized electronic filing system. See Montgomery County Common Pleas Court Loc. R. 1.15, Electronic Filing of Court Documents, for requirements of electronic filing. Local rules can be accessed at www.montcourt.oh.gov. Service of the Answer will be made upon the Plaintiff's attorney through the Court's authorized electronic filing system. If the Plaintiff does not have an attorney, your attorney is required to serve a paper copy of your Answer to the Plaintiff.

If you are representing yourself (appearing pro se), you have the option to file your Answer in paper OR through the Court's authorized electronic filing system (See Loc. R. 1.15, Electronic Filing of Court Documents). Local rules can be accessed at www.montcourt.oh.gov. If you file your Answer in paper, you are required to serve a paper copy of your Answer to the Plaintiff's Attorney or the Plaintiff. If you file your Answer electronically, service of the Answer will be made upon the Plaintiff's attorney through the Court's authorized electronic filing system. If the Plaintiff does not have an attorney, you are required to serve a paper copy of your Answer to the Plaintiff.



/s/ MIKE FOLEY, ISSUED Thursday, December 9, 2021

**MIKE FOLEY, CLERK
COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

PREPARED ELECTRONICALLY

**In The Court Of Common Pleas, Montgomery County Ohio
Civil Division**

RETURN OF SERVICE SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310236242

TO THE FOLLOWING NAMED PARTY:

JOHN AND OR JANE DOE EMPLOYEE

UNKNOWN ADDRESS

DAYTON, OH 45422

RETURN OF SERVICE(PERSONAL)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made personal service of it upon _____ by locating him/them and tendering a copy of the document and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(RESIDENCE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made residence service of it upon _____ by leaving, at his/their usual place of residence with _____ a person of suitable age and discretion then residing therein a copy of the complaint and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(FAILURE OF SERVICE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. with instructions to make personal/residence service upon _____

_____ and I was unable to serve a copy documents upon him/them for the following reasons:

By _____

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**IN THE COURT OF COMMON PLEAS, MONTGOMERY COUNTY OHIO
CIVIL DIVISION**

SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310238922

TO THE FOLLOWING NAMED DEFENDANT:

XYZ CORPORATION
UNKNOWN ADDRESS
DAYTON OH 45422

You have been named a Defendant or Respondent in a complaint filed in Montgomery County Court of Common Pleas, Dayton, Ohio. **A copy of the Complaint is attached.**

BY:

CYNTHIA WILLIAMS
1555 N. EUCLID AVE
DAYTON, OH 45406

PLAINTIFF ATTORNEY:

ROBERT L. GRESHAM
130 W SECOND ST
SUITE 1600
DAYTON, OH 45402

You are hereby summoned and required to serve upon the Plaintiff's attorney, or upon the Plaintiff, if the Plaintiff does not have an attorney, a copy of an **Answer to the Complaint** within **28 days after receipt of this summons, exclusive of the day you received the summons.** Your original **Answer** must be filed with the Clerk of Court's Office **within 3 days** after you serve the Plaintiff's attorney or Plaintiff.

If you fail to appear and defend, Judgment by Default may be rendered against you granting Plaintiff(s) the relief demanded in the Complaint.

NOTE:

If you are represented by an attorney, your attorney is required to electronically file your Answer through the Court's authorized electronic filing system. See Montgomery County Common Pleas Court Loc. R. 1.15, Electronic Filing of Court Documents, for requirements of electronic filing. Local rules can be accessed at www.montcourt.oh.gov. Service of the Answer will be made upon the Plaintiff's attorney through the Court's authorized electronic filing system. If the Plaintiff does not have an attorney, your attorney is required to serve a paper copy of your Answer to the Plaintiff.

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/s/ MIKE FOLEY, ISSUED Thursday, December 9, 2021

MIKE FOLEY, CLERK

**COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

PREPARED ELECTRONICALLY

**In The Court Of Common Pleas, Montgomery County Ohio
Civil Division**

RETURN OF SERVICE SUMMONS

PLAINTIFF

CYNTHIA WILLIAMS

VS

DEFENDANT

FAMILY DOLLAR STORES OF OHIO INC et al

CASE NUMBER

2021 CV 05016

ARTICLE NUMBER

287310238922

TO THE FOLLOWING NAMED PARTY:

XYZ CORPORATION

UNKNOWN ADDRESS

DAYTON, OH 45422

RETURN OF SERVICE(PERSONAL)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made personal service of it upon _____ by locating him/them and tendering a copy of the document and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(RESIDENCE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. and made residence service of it upon _____ by leaving, at his/their usual place of residence with _____ a person of suitable age and discretion then residing therein a copy of the complaint and accompanying documents, on _____, 2021.

By _____

RETURN OF SERVICE(FAILURE OF SERVICE)

FEES

SERVICE \$ _____

MILEAGE _____

TOTAL \$ _____

DATE _____

I received the document on _____, 2021, at ____ o'clock ____ M. with instructions to make personal/residence service upon _____

_____ and I was unable to serve a copy documents upon him/them for the following reasons:

By _____

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IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO

CYNTHIA WILLIAMS,

Plaintiff,

vs.

FAMILY DOLLAR STORES OF OHIO,
INC., et al.

Defendants.

CASE NO. 2021 CV 05016

JUDGE RICHARD S. SKELTON

**NOTICE OF APPEARANCE
OF COUNSEL**

The Court and parties hereto will take notice that Christopher E. Cotter, Esq. and Krystina E. Garabis, Esq. of Roetzel & Andress, LPA, hereby enter their appearance as counsel of record for Defendant, Family Dollar Stores of Ohio, Inc., in the above-captioned matter.

It is respectfully requested that service of all further pleadings, notices, filings, papers, etc. be made upon the undersigned as counsel of record for said Defendant.

Respectfully submitted,

/s/ Christopher E. Cotter

Christopher E. Cotter (84021)

ccotter@ralaw.com

Roetzel & Andress, LPA

222 South Main Street

Akron, OH 44308

Direct: 330.819.1127

Telephone: 330.376.2700

Facsimile: 330.376.4577

Krystina E. Garabis (100120)

kgarabis@ralaw.com

Roetzel & Andress, LPA

41 South High Street

Huntington Center, 21st Floor

Columbus, OH 43215

Telephone: 614.696.6560N

Facsimile: 614.463.9792

ATTORNEYS FOR DEFENDANT
FAMILY DOLLAR STORES
OF OHIO, INC.

PROOF OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via the Court's electronic filing system this 14th day of December, 2021. Notice of this filing will be sent to all parties registered to receive service through the Court's electronic filing system, or via U.S. Mail, postage prepaid if not registered.

Robert L. Gresham
Michael L. Wright
Kesha Q. Brooks
WRIGHT & SCHULTE, LLC
130 W. Second Street, Suite 1600
Dayton, Ohio 45402
Phone: 937.222.7477
Fax: 937.222.7911
rgresham@yourohiollegalhelp.com
mwright@yourohiollegalhelp.com
kbrooks@yourohiollegalhelp.com

ATTORNEYS FOR PLAINTIFF
CYNTHIA WILLIAMS

/s/ Christopher E. Cotter

One of the Attorneys for Defendant
Family Dollar Stores of Ohio, Inc.

IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO

CYNTHIA WILLIAMS,

Plaintiff,

vs.

FAMILY DOLLAR STORES OF OHIO,
INC., et al.

Defendants.

CASE NO. 2021 CV 05016

JUDGE RICHARD S. SKELTON

**NOTICE OF SUBSTITUTION OF
COUNSEL**

Now comes Robert W. Schrimpf of the law firm of Roetzel & Andress, LPA, and hereby enters his appearance as co-counsel for Defendant Family Dollar Stores of Ohio, Inc. in place of Krystina E. Garabis.

Christopher E. Cotter shall remain as co-counsel for Defendant. All future pleadings relating to the above-captioned case should be served by mail and/or electronic mail to the undersigned, in addition to those attorneys already of record.

Respectfully submitted,

/s/ Robert W. Schrimpf

Christopher E. Cotter (84021)

ccotter@ralaw.com

Roetzel & Andress, LPA

222 South Main Street

Akron, OH 44308

Direct: 330.819.1127

Telephone: 330.376.2700

Facsimile: 330.376.4577

Robert W. Schrimpf (85020)

rschrimpf@ralaw.com

Roetzel & Andress, LPA

625 Eden Park Drive, Suite 450

Cincinnati, OH 45202

Telephone: 513.361.0200

Facsimile: 513.361.0335

ATTORNEYS FOR DEFENDANT
FAMILY DOLLAR STORES
OF OHIO, INC.

PROOF OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via the Court's electronic filing system this 21st day of December 2021. Notice of this filing will be sent to all parties registered to receive service through the Court's electronic filing system, or via U.S. Mail, postage prepaid if not registered.

Robert L. Gresham
Michael L. Wright
Kesha Q. Brooks
WRIGHT & SCHULTE, LLC
130 W. Second Street, Suite 1600
Dayton, Ohio 45402
Phone: 937.222.7477
Fax: 937.222.7911
rgresham@yourohiolegalhelp.com
mwright@yourohiolegalhelp.com
kbrooks@yourohiolegalhelp.com

ATTORNEYS FOR PLAINTIFF
CYNTHIA WILLIAMS

/s/ Robert W. Schrimpf

One of the Attorneys for Defendant
Family Dollar Stores of Ohio, Inc.